

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

JENNIFER VETRANO,

*Plaintiff,*

VS.

JOHN BRDA, ALLISON CHRISTILAW,  
MBA, ICD.D B, JOHN R. HARDING, UZI  
SASSON, DAN EATON ESQ, MAURICE  
GUTTON, ERIC M. LESLIE, PHILIPPE  
MORALI, KEN HANNAH, STEEN  
KARSBO, JOHN DOES 1–20, JANE DOES  
1–20,

*Defendants.*

[illegible]

Case No. 7:24-CV-325-DC-RCG

## **DEFENDANT BRDA'S UNOPPOSED MOTION TO EXTEND PLEADING DEADLINE**

Defendant John Brda files this unopposed motion seeking an extension of his deadline to answer or otherwise respond to Plaintiff's Amended Complaint [ECF No. 3] and respectfully shows the Court as follows:

1. Plaintiff filed a Complaint on December 9, 2024. [ECF No. 1]
2. Plaintiff filed an Amended Complaint, spanning nearly 70 pages and 277 paragraphs, against dozens of defendants, with at least 7 causes of action on December 27, 2024. [ECF No. 3]
3. On February 10, 2025, Plaintiff requested an issuance for summons [ECF No. 4], which was issued on February 13, 2025. [ECF No. 5]
4. On February 25, 2025, Mr. Brda was served with the Amended Complaint and his deadline to answer or otherwise respond to the Amended Complaint is currently March 18, 2025.

5. There is good cause, pursuant to Federal Rule of Civil Procedure 6(b), for an extension because on February 26, 2025, the Plaintiff requested a 90-day extension of time to serve the summons on certain other defendants [ECF No. 6], which the Court granted.

6. In addition, undersigned counsel is aware of at least three other matters pending before your Honor where no responsive pleadings have been filed, with common parties, and common questions of law and fact, which include the following:

- *Willcot v. SEC, et al.*, No. 7:24-cv-317 (W.D. Tex. Dec. 6, 2024);
- *Spears v. Next Bridge Hydrocarbons Inc., et al.*, No. 7:24-cv-321 (W.D. Tex. Dec. 6, 2024); and
- *Pease v. SEC, et al.*, No. 7:24-cv-322 (W.D. Tex. Dec. 9, 2024).

7. Good cause for this extension is made because it would assist in the efficient presentation to the Court of Mr. Brda's defenses, along with the other defendants, and promote judicial economy.

8. Accordingly, Mr. Brda respectfully requests that the Court extend his deadline to answer or otherwise respond to Plaintiff's Amended Complaint by 90 days to June 16, 2025.

9. This is Mr. Brda's first request for an extension of time.

10. This extension is not sought for purposes of delay, but so that justice may be done.

11. Undersigned counsel conferred with *pro se* Plaintiff; Plaintiff indicated she is unopposed to the requested extension. No other party has made an appearance.

[signature page follows]

Dated: March 14, 2025.

Respectfully submitted,

/s/ Jason S. Lewis

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***ATTORNEYS FOR DEFENDANT JOHN BRDA***

**CERTIFICATE OF CONFERENCE**

Pursuant to the Western District of Texas's Local Civil Rule CV-7(G), the undersigned hereby certifies that, as counsel for Defendant Brda, he conferred with Plaintiff Jennifer Vetrano via email. Plaintiff has indicated that she is not opposed to the 90-day extension requested herein.

/s/ Ryan D. Lantry  
Ryan D. Lantry

**CERTIFICATE OF SERVICE**

I certify that I served the foregoing document on all counsel of record via the Court's CM/ECF system on March 14, 2025.

/s/ Jason S. Lewis  
Jason S. Lewis